

ATTACHMENT TO REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE FORM
GDCI-083301-1554

Registrant: Troy Chemical Corporation

Active Ingredient: Hexahydro-1,3,5-tris(2-hydroxyethyl)-s-triazine

Troy Chemical Corporation is requesting data waivers for several of the studies listed in the Generic Data Call-In (GDCI) for hexahydro-1,3,5-tris(2-hydroxyethyl)-s-triazine (HHT). The specific data requirements that waivers are being requested are discussed below. In addition, comments are being provided regarding some of the data requirements for which studies will be submitted.

Environmental Fate and Non-Target Organism Data Requirements

Data waivers are being requested for the following studies:

<u>Guideline Number</u>	<u>Study Title</u>
835.1110	Activated sludge sorption isotherm
835.1230	Sediment and soil absorption/desorption for parent and degradates
835.2120	Hydrolysis of parent and degradates as a Function of pH at 25°C
835.3110	Ready biodegradability
835.3220	Porous pot test
835.3240	Simulation test- Aerobic sewage treatment – activated sludge
835.3280	Simulation tests to assess the biodegradability of chemicals
835.4300	Aerobic aquatic metabolism
850.3300	Modified activated sludge, Respiration inhibition test
850.4400	Aquatic plant toxicity using Lemna
850.1300	Daphnid chronic toxicity test

Basis for Waivers

As discussed in the submission provided to the Agency on July 11, 2016 (attached), HHT is expected to rapidly degrade upon aqueous dilution. The predominant degradates are monoethanolamine and formaldehyde. The substance 1,3,5-trimethyl triazine does not result from the degradation of HHT. Accordingly, the substances present in the environment from the use of HHT will be monoethanolamine and formaldehyde (minor degradates, methanol and 1,3-oxazolidine, might also be present). Therefore, the requested environmental fate and ecotoxicity studies would be actually be testing a mixture of monoethanolamine and formaldehyde, not HHT or 1,3,5-trimethyl triazine. Since there is an ample environmental fate and ecological effects database on monoethanolamine and formaldehyde, conducting additional studies with this mixture will not provide any useful additional data.

The degradation behavior of HHT was evaluated in the hydrolysis study with metal working fluids that was previously submitted to the Agency (MRID No. 48741001) and the study recently submitted by Troy Chemical Company (“HHT Hydrolysis –Evidence on Dissociation”). If there are any issues that remain regarding the degradation of HHT and the resulting degradates these can be addressed in a follow-up hydrolysis study. In this situation, the Agency should reserve the GDCI environmental fate studies until a final determination is made regarding the degradation behavior of HHT.